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18 [Additional Counsel for the Parties Listed on Last Page]

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

21 PAULA L. BLAIR, ANDREA ROBINSON,
22 and FALECHIA A. HARRIS, individually and
on behalf of all others similarly situated,

23 Plaintiffs,

24 vs.

25 RENT-A-CENTER, INC., a Delaware
26 corporation; RENT-A-CENTER WEST, INC.,
a Delaware corporation; and DOES 1-50,
27 inclusive,

28 Defendants.

CASE NO. 3:17-cv-02335-WHA

**STIPULATION AND ~~PROPOSED~~
ORDER TO STAY DISCOVERY
DEADLINES**

Judge: Hon. William Alsup
Crtrm.: 12 (19th Floor)

1 Through their respective counsel, plaintiffs Paula L. Blair, Andrea Robinson, Falechia
 2 Harris, and Celinda Garza (“Plaintiffs”) and defendants Rent-A-Center, Inc. and Rent-A-Center
 3 West, Inc. (collectively, “RAC”) request that the Court stay all discovery deadlines, including the
 4 deadlines for non-expert discovery, supplemental expert reports, and expert discovery set in the
 5 Order entered on February 25, 2019 (“February 25 Order”) (Dkt. No. 186). Staying all discovery
 6 deadlines is appropriate in light of the settlement reached by the parties at the Settlement Conference
 7 held on March 28, 2019 (the “Settlement”) (Dkt. No. 193).

8 STIPULATION

9 WHEREAS, in the February 25 Order, the Court vacated the dates previously set for the
 10 pretrial conference and trial, set deadlines for the completion of discovery (April 30, 2019 is the
 11 cutoff for non-expert discovery; May 17, 2019 is the last day for disclosure of supplemental expert
 12 report; and June 7, 2019 is the expert discovery cutoff), and stayed the remainder of the case pending
 13 resolution of RAC’s appeal to the Ninth Circuit, *Blair, et al. v. Rent-A-Center, Inc., et al.*, No. 19-
 14 80024 (Dkt. No. 186 at 1);

15 WHEREAS, on March 7, 2019 and March 28, 2019, the parties participated in full-day
 16 settlement conferences before Chief United States Magistrate Judge Joseph C. Spero;

17 WHEREAS, at the March 28 Settlement Conference, the parties were able to reach a
 18 resolution of the litigation and executed the Binding Settlement Memorandum of Understanding
 19 (Dkt. No. 193-1);

20 WHEREAS, the parties are currently working to memorialize the settlement terms in a
 21 comprehensive settlement agreement, which will be followed by a motion for preliminary approval,
 22 and pending completion of those steps, the parties seek to stay all discovery deadlines;

23 WHEREAS, because there is no trial date set and the remainder of the litigation (other than
 24 discovery) is stayed, a stay of the discovery deadlines would conserve resources and promote
 25 judicial economy, without any impact on the Court’s calendar;

26 NOW, THEREFORE, the parties respectfully request that the Court stay all discovery
 27 deadlines, including the non-expert discovery cutoff, last day for disclosure of supplemental expert
 28 reports, and expert discovery cutoff.

1 IT IS SO STIPULATED.

2 DATED: April 15, 2019

DOSTART HANNINK & COVENEY LLP

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/s/ Zach P. Dostart

ZACH P. DOSTART

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Attorneys for Plaintiffs

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DATED: April 15, 2019

DECHERT LLP

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/s/ Lily North

LILY NORTH

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Attorneys for Defendants

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ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from Lily North, counsel for defendants Rent-A-Center, Inc. and Rent-A-Center West, Inc.

Dated: April 15, 2019

DOSTART HANNINK & COVENEY LLP

/s/ Zach P. Dostart

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ORDER

Having reviewed and considered the foregoing Stipulation, and finding good cause,

IT IS HEREBY ORDERED that all discovery deadlines are stayed pending further order of this

Court.

IT IS SO ORDERED.

Dated: April 23, 2019



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

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